

1 Law Office of G. Anthony Long
2 P.O. Box 504970
3 San Jose, Saipan, MP 96950
4 Tel. No. (670) 235-4802
5 Fax. No. (670) 235-4801

6 Attorney for KSK Corporation and Kim Ki Sung

7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE
10 NORTHERN MARIANA ISLANDS

11 LI YING HUA, LI ZHENG ZHE and XU JING JI,)

CASE NO. CV 05-0019

12 Plaintiffs,)

13 vs.)

14 DEFENDANT'S OBJECTIONS AND
15 PRODUCTION TO PLAINTIFFS' FIRST
16 REQUEST FOR PRODUCTION OF
17 DOCUMENTS

18 JUNG JIN CORPORATION, a CNMI corporation,)
19 ASIA ENTERPRISES, INC., a CNMI corporation,)
20 PARK HWA SUN, KIM HANG KWON,)
21 KSK CORPORATION, a CNMI corporation,)
22 and KIM KI SUNG,)

23 Defendants.)
24
25
26

FIRST REQUEST TO PRODUCE

1. Please produce an un-redacted copy of what has been attached hereto as Exhibit "A."

Doc. #39

Objection: Defendant objects to this request because it seeks to obtain information that is not relevant and seeks information protected from disclosure by work product, party communications and pertains to personal information about other entities whom are not a party to this action. Defendant cannot produce an un-redacted copy of this exhibit.

RECEIVED FEB 20 2008 4:25

EXHIBIT A

1
2 11. Please produce any and all DOCUMENTS REFLECTING any or all of the payment KIM
3 SUNG EUN made to YOU for the purchase of 180,000 shares of YOUR common stock regardless of
4 the form of the payment.

5 There are no documents for this request.
6

7 12. Please produce any and all DOCUMENTS REFLECTING any or all of the payment KIM
8 OK JA made to YOU for the purchase of 20,000 shares of YOUR common stock regardless of the
9 form of the payment.
10

11 There are no documents for this request.
12

13 13. Please produce all of YOUR CORPORATE RECORDS.
14

15 See responses and objections to request # 2, 3 and 4.
16

17 *KIM #10* 14. Please produce all DOCUMENTS submitted to the COMMONWEALTH
18 GOVERNMENT by YOU for any reason at any time from December 1, 2005 through March 31,
19 2006.

20 **Objection:** Defendants object to this request as not relevant, overly broad and
21 burdensome. Subject to and without waiving the foregoing objection, Defendant has
22 produced the requested documents. Any and all documents submitted to the CNMI
23 Government during the requested time period is contained within the documents copied onto
24 the Disk.
25

ANNUAL CORPORATION REPORT

FILED
Commonwealth of the
Northern Mariana Islands

Filing Fee \$50.00 / Make Check Payable to: CNMI TREASURER
File Original and One Copy

2004 MAR -1 PM 4:18

FILING: THE INITIAL REPORT MUST BE FILED WITHIN 60 DAYS OF INCORPORATION.
ANNUAL REPORT MUST BE FILED ON OR BEFORE MARCH 1ST OF EACH YEAR.

FILE WITH: REGISTRAR OF CORPORATIONS
Office of the Attorney General
2nd Floor, Memorial Bldg./Capitol Hill
Saipan, MP 96950

FILED
Commonwealth of the
Northern Mariana Islands

INITIAL REPORT: _____ REPORT FOR THE YEAR 2003
CHECK ONE: ☒ Domestic Corporation () Foreign Corporation

Name, Mailing Address & Telephone No. of Corporation: (Attach map showing location if address is only a P. O. Box)

KSK Corporation Inc.
PMB 234 Box 10001
Saipan, MP 96950

Telephone Number: 234-2331

Name, Mailing Address & Telephone No. of Registered Agent: (Attach Map showing location if address is only a P. O. Box)

Carolina Castro
PO Box 503500 CK
Saipan, MP 96950

Telephone Number: 235-5442

LIST OF DIRECTORS:

Name	Nationality	Address
Kim, Sung Eun	Korean	PMB 234 Box 10001, Saipan, MP 96950
Kim, Ok Ja	Korean	Same as above

LIST OF OFFICERS:

Name	Position	Nationality	Address
Kim, Sung Eun	President/Secretary	Korean	Same as above
Kim, Ok Ja	Vice-Pres./Treasurer	Korean	Same as above

DESCRIPTION OF BUSINESS ACTIVITIES - List all lines of business:

Trade, amusement, poker, game room, investment transaction, venture and tour agency, and internet business.

STOCK ISSUED AND OUTSTANDING:

Number of Shares	Class of Shares	Amount Paid for Shares
200,000 Shares	Common Stock	\$20.00

NAME OF SHAREHOLDERS	IMMIGRATION STATUS	NATIONALITY	NUMBER OF SHARES HELD
Kim, Sung Eun	L.T.B.E.P	Korean	180,000.00
Kim, Ok Ja	Off- Island	Korean	20,000.00

Date: 3/1/04

Signature: 

Kim, Sung Eun - President

PRINT NAME & TITLE OF PERSON SIGNING
(Must be Director or Officer of the Corporation.)

EXHIBIT B

KSK DOC - # 580

KYUNG YEE LEE

P.O. Box 502926, Saipan, MP 96950

Tel. No. 235-3334 Fax No. 235-4225

Mr. Mark B. Hanson
Second Floor, Macaranas Building
Beach Road, Garapan
Saipan, CNMI

Although I have had some friendly transactions with Mr. Ki Sung Kim, the loans were made in cash and on long standing trust for each other's convenience, thus no records to evidence them are available.

Dated this 27 day of May, 2008.



Kyung Yee Lee

May 23, 2008

Mark B. Hanson
PMB 738, P.O. Box 10,000
Saipan MP 96950

Re: Response to Subpoena in a Civil Case

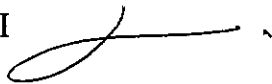
This letter comes to you to certify that I have made personal loan to Mr. Ki Sung Kim in the amount of \$70,000 around February, 2005 and that the loan has been duly repaid with accrued interest of \$6,000.

I can not produce any documents as they are not kept any more.

I hope this will help.

Sincerely,

SEO YONG KI

A handwritten signature in black ink, consisting of a stylized 'S' followed by a horizontal line and a small flourish.

Landscaping - Logistics

Area Code 670

Your connection to the world



Your connection to the world

Tropical Garden
As Mahetog 322-5118
Fax 323-1044

Laundry

Best Laundry
Chalan Kanoa 235-1047
Clean Laundry
Susupe 235-8244
Cool Laundry
As Lito 288-2331
D.K.K. Incorporated
San Vicente 235-3135
Drop Off Laundry
Garapan 233-3767
Kagman Laundry
Kagman 256-3125
Kang Corporation
Dandan 234-9368
Koblerville 288-9364
Kims General Incorporated
San Jose 234-7191
Marianas Cleaners
Susupe 234-5323/6239
Fax 234-1712
Pacific Five Star Inc
San Antonio 234-8265
Tropical Laundry & Linen
Puerto Rico 322-3077/78
Fax 322-4062
Welcome Laundry Market
Chalan Kanoa 235-8949
Wonderful Market
Susupe 235-6638

Lawn & Garden Equipment

Ace Hardware
Gualo Rai 235-9322
Fax 235-9325
Susupe 234-3117
Fax 235-7568
San Vicente 234-3176
Fax 235-0007
Rota 532-9322
Fax 532-9325

ECHO LAWN & GARDEN EQUIPMENT

Chalan Kanoa 235-2302/2303
Fax 235-2304

Mid Pac Micronesia
Middle Road, Gualo Rai
Tel 234-0475
Fax 234-0476

Windsock Saipan Inc.
See Ad Under Equipment Sales
Tel 234-6001
Fax 234-6003

Lawn & Garden Maintenance

Advance Janitorial
Garapan 233-0210
Fax 233-2629

Lawyers (See Attorneys)

Leather Goods

Louis Vuitton Saipan Inc
Garapan 233-0636
Fax 233-0638

Lighting System & Equipment

Spectrum Electric Inc
See Ad Under Electrical Contractors
Lower Base 322-4600
Fax 322-4699

Liquor

Diamond Ko Saipan Ltd
China Town 233-6885
Fax 233-6889
M C Asia International
Middle Road Gualo Rai
Tel 235-6100

Loans

Friendly Finance Co., Inc
Tel 234-6676
Fax 234-5104

WELLS FARGO FINANCIAL

San Jose
Chalan Monsignor Guerrero
Saipan, MP 969509

Phone: 235-6030
Fax: 235-6040

Locksmiths

Action Locksmith
San Antonio 235-5541

Logistics

B D I Logistics
Garapan 233-6688



*Can help you grow your
small business one
block at a time*

We can help you take the
headache out of marketing
your company, products
and services.

Our professional in-house
marketing team will sit down with
you and design an advertising
and promotional program to fit
your budget and help you reach
new customers. We can do
everything for you - design,
create and place your ads to
provide you with the best results
possible.



Guam Sales
(671) 477-5700 or sales@spbgum.com

Saipan Sales
(670) 235-7996 or tpalacios@power99.net

Long Distance

I T & E OVERSEAS INC

San Jose 234-8521
Fax 234-8525

Prime Group
Gualo Rai 235-3970

PTI

Information 411
Trouble Desk 611
Internet Helpline 682-1060
Customer Service 234-7143
Fax 234-8574
Payment Fax 235-8699
Administration 234-6100
Human Resources 234-6600
Sales & Marketing 682-2877
Sales Fax 235-2877
Marketing Fax 682-6170
(See ad this classification)

Saipanceil

Middle Road, Gualo Rai
Tel 483-CARE(2273)
Fax 235-7640
(See ad this classification)

Startec

Susupe 235-4724
T N I
Garapan 233-5360/8878

Lottery Ticket Agents

Marianas Lottery
Susupe 235-6633/7788
Numbers International Corp
As Lito 235-2015

Lubricants

SHELL MARIANAS

Puerto Rico 323-5009/ 1014
Or Call 323-0647/3847
Fax 322-0764



We can help you take the headache out of
marketing your company, products and
services by designing and creating effective
ads for you and managing the entire process.

Radio Stations: Newstalk K57, Power 98, The Rock 105.1,
Power 99, The Rock 97.9
TV Stations: ABC 7 Guam, Fox 8 Guam, ABC 7 Saipan
Contact Us: Guam (671) 477-5700, Saipan (670) 235-7996